

Thank you for your comment, Jeneen Beckett.

The comment tracking number that has been assigned to your comment is POCSWS50009.

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Well Stimulation Treatments on the Southern California OCS Draft EA
Comment ID: POCSWS50009

First Name: Jeneen
Middle Initial:
Last Name: Beckett
Organization:
Address: 268 Norwood Ave.
Address 2:
Address 3:
City: Youngstown
State: OH
Zip: 44504
Country: USA
Privacy Preference: Don't withhold name or address from public record
Attachment: Public Comment Well Stimulation.docx

Comment Submitted:

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Public Comment

Programmatic Environmental Assessment of the Use of Well Stimulation Treatments on the Southern California Outer Continental Shelf^[8.1 MB], February 22, 2016 through March 23, 2016.

Dear Sir or Madame,

I would insist that since you have the option that you ban fracking in Pacific waters altogether.

Fracked wells are not safe and the discharge is not benign. That Santa Barbara coastline and the marine life are too important for all, both commercially and aesthetically, to be placed in harm's way for profits to limited private investors in the middle of an oil glut.

Below are the underlined portions of this proposal with which I take umbrage and a synopsis of my own experience with fracking here on land.

Or in summation: "If you would drink that discharge" you can approve it and if you will "sell your house to pay for the cleanup" when the beaches are despoiled you can approve it. We pay you to be the most critical cynics not to pretend numbers on paper support private interest's Pollyanna projections.

I sit in the middle of the finest wetlands in the State of Ohio and the midst of a ridiculous surge of land fracking. Below is a summation of what I know from experience and the reality is far from the "best practices" and safety we were promised.

Here are some highlights from Fracked Ohio:

- 1) 1000 feet away from anything is not enough distance: just one overloaded injection well in Ohio caused dozens of earthquakes including at least one major one and we are "on solid ground" relatively speaking to the California fault zones.
- 2) The saturated soil from these wells is so "hot" radioactively speaking that it cannot be disposed of in dumps. So now they take it and mix it with topsoil using earth moving equipment flipping the stuff in open air two miles from my house! Just one permit was supposedly needed and there was no public hearing on this absurd process. It's too dangerous to shove it underground, so let's toss it in the air!
- 3) Just a month ago the city water department issued a warning that our water which comes from a pristine reservoir now contains additional "methane" related impurities. Oh and we were scoffed at and were told that there was no way the gas could reach the surface waters.
- 4) The "Halliburton Law" as it is fondly referred to somehow states that the injection fluid used in those wells is "proprietary" so how do you propose to know what is being dumped into the ocean? Where is the EPA breakdown of those contaminants'?
- 5) All of our university geologists oppose shale fracking.

Below is the portion of the Santa Barbara impact study with which I especially take umbrage (7 thru 46)

Billions of gallons of waste do not “disappear”. The marine biota cannot just absorb it and make it go away. All of the coastal marine life is already stressed especially Pinnipeds like seals by warming oceans and pollution. Tropical marine life is moving north creating biological havoc. Drift netting is horrific and abandoned nets cause massive devastation.

You would add these fracking chemicals to this already suffering situation? One single “blow out” would destroy nesting seabirds many of which are endangered.

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A fraction of the injected WST chemical additives is typically recovered and becomes part of the produced water waste stream 43 following separation. Chemical additives are largely consumed during treatment or retained in 44 the formation. The water phase is treated and disposed of in the same manner as that used for 45 produced water during routine (non-WST) oil and gas production, via NPDES-permitted open 1 water discharge, or by reinjection. 2

If the APD or APM is 7 for a hydraulic fracture operation, OPD will also look at the proposed fracture in relation to 8 active faults and the location of other wellbores, staying at least 1000 ft away from either.

Following their use in a WST at a well, acids will be largely chemically consumed and 9 neutralized, and associated waste fluids would be collected, comingled, and diluted with 10 produced water from the well. This WST waste fluid-produced water mixture would then be 11 further diluted when combined with produced water from other wells at the platform, and 12 possibly further diluted if combined with the produced water waste stream from other platforms 13 (as occurs at some platforms; see Section 4.2.3). This produced water with highly diluted WST- 14 related waste chemicals would then be treated prior to any permitted open ocean discharge. A 15 portion of non-acid WST chemicals (over 90% in the case of hydraulic fracturing WSTs [see 16 Section 4.5.1.3]) is retained in the formation and is not recovered or recovered slowly in waste 17 fluids. As with WST acids, non-acid WST chemicals collected in the waste stream from a well 18 would be similarly diluted and treated prior to any permitted release to the ocean. 19 20 To ensure protection of water quality and marine biota, the NPDES permit for the OCS 21 platforms identifies concentration limits at the boundary of a 100-m (328-ft) mixing zone around 22 the discharge point, and no effects on water quality are expected beyond the mixing zone (see 23 Section 4.5.1.3). To address potential toxicity of unspecified WST constituents in discharges, the 24

NPDES permit requires quarterly whole effluent toxicity (WET) testing of produced water, 25 which would include any WST-related fluids and chemicals. The WET tests evaluate chronic 26 toxicity of the produced water and thus captures the cumulative risk of exposure to groups of 27 chemicals, which is how environmental exposure would occur (exposure would not be on a 28 chemical-by-chemical basis, but rather would be simultaneous to a mixture of all chemical 29 constituents in the discharged water). 30 31 At a well undergoing a WST, all WST waste fluids are highly diluted through mixing 32 with produced water from multiple wells and are subsequently treated prior to discharge. The 33 NPDES permit regulating ocean discharge from the platforms (which is where exposure to WST- 34 related chemicals would first occur) includes concentration limits for protecting water quality as 35 well as WET testing for evaluating the chronic toxicity of the contaminant mixture in the 36 permitted discharge. Because waste fluids containing WST-related chemicals would be highly 37 diluted and then treated prior to any permitted open ocean discharge, and because of required 38 compliance with the NPDES permit concentration limits and WET toxicity testing, an alternative 39 limiting the use of some chemicals would be expected to provide little further protection to water 40 quality and marine biota beyond that provided under the NPDES permit currently regulating 41 platform discharges on the OCS. If analysis of the alternatives finds impacts on water quality or 42 marine biota due to the presence of certain WST-related chemicals, then at that point further 43 alternatives could be developed that limit the use those WST chemicals that contributed to the 44 impacts. 45 46

Submitted:

Jeneen Beckett

2/25/2016